

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ERICA BERRIOS,

Plaintiff,

v.

**KOS SERVICES, LLC, d/b/a DENTAL
DREAMS ,**

Defendant.

Case No. 1:20-cv-07072

Honorable Harry D. Leinenweber
Magistrate Judge Sunil R. Harjani

**DEFENDANT’S AGREED MOTION FOR
EXTENSION OF TIME TO FILE RESPONSIVE PLEADING**

Defendant KOS Services, LLC, d/b/a Dental Dreams (“KOS”)¹, by and through its attorneys, respectfully requests a sixteen (16) day extension of time to answer or otherwise plead to Plaintiff’s Amended Complaint, up to and including April 9, 2021. Plaintiff is in agreement with this Motion. In support of this Motion, KOS states as follows:

1. On February 12, 2021, KOS timely filed its Motion to Dismiss in response to Plaintiff’s original Complaint. (Dkt. No. 11.)

2. On March 10, 2021, Plaintiff filed her Amended Complaint after being granted leave to do so. (Dkt. No. 18.) Accordingly, KOS’s deadline to respond to Plaintiff’s Amended Complaint is March 24, 2021.

3. KOS seeks a sixteen (16) day extension of time, for a total of thirty (30) days, to prepare a responsive pleading to Plaintiff’s Amended Complaint, in which Plaintiff re-pleads various wage and whistleblower claims.

4. On March 11, 2021, KOS’s counsel communicated with Plaintiff’s counsel and requested an extension of the responsive pleading deadline in order to prepare its responsive

¹ Defendant KOS Services is incorrectly named in the Complaint as KOS Services, LLC d/b/a Dental Dreams.

pleading. Plaintiff's counsel confirmed that Plaintiff was in agreement with a 16-day extension of KOS's responsive pleading deadline.

5. Accordingly, KOS respectfully requests a 16-day extension of time, up to and including April 9, 2021, for KOS to answer or otherwise plead to Plaintiff's Amended Complaint.

6. If KOS's responsive pleading deadline is extended to April 9, 2021, there are no other existing case deadlines that will be affected.

7. KOS does not make this request for purposes of delay. This is the first request for an extension of KOS's responsive pleading deadline to Plaintiff's Amended Complaint.

Therefore, KOS respectfully requests that this Court grant this Agreed Motion for Extension of Time to File Responsive Pleading, and extend the time for KOS to answer or otherwise plead to Plaintiff's Amended Complaint up to and including April 9, 2021.

Dated: March 22, 2021

Respectfully submitted,

**KOS SERVICES, LLC, d/b/a DENTAL
DREAMS**

/s/ Kendell R. Coates

One of its Attorneys

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CERTIFICATE OF SERVICE

Kendell R. Coates, an attorney hereby certifies that on March 22, 2021, he electronically filed a copy of *Defendant's Agreed Motion For Extension Of Time To File Responsive Pleading* via the CM/ECF filing system with the United States District Court for the Northern District of Illinois, and that the following CM/ECF participants were served with a copy of same through the CM/ECF filing system:

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/s/ Kendell R. Coates

Kendell R. Coates